

# EXHIBIT B

**From:** Scott Jacobson <jacobson@usc.edu>  
**To:** Donna Heinel  
**CC:** Orr, Ron  
**Sent:** 2/21/2014 7:19:15 PM  
**Subject:** Re: [REDACTED]

Yeah seems like they are positioning just for Marshall. Lets carve out for us especially if you did all the heavy lifting

Sent from my iPhone

On Feb 21, 2014, at 4:01 PM, Donna Heinel <dheinel@usc.edu> wrote:

Ron,

If this is not working out the way you planned, I can have Admissions pull the approval. Let me know. Tell them it was a backdoor development case of Marshall that I was not aware of.

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**From:** Peyron Murphy, Sarah [mailto:peyronmu@marshall.usc.edu]  
**Sent:** Friday, February 21, 2014 3:16 PM  
**To:** Liz Frank; Orr, Ron  
**Cc:** Donna Heinel; Scott Jacobson  
**Subject:** Re: [REDACTED]

Hi Ron,

I completely echo Liz's sentiments in her email below. We have developed a great relationship with [REDACTED] over the past year, which has included several conversations about his desire to support Marshall.

That said, I am 100% in support of a donor-centered strategy that represents the [REDACTED] relationship with USC. While [REDACTED] interest in supporting business is clear, [REDACTED] passion for athletics will likely play a significant role in their shared experiences with the University. Liz and I will make sure that plays an equal part in our development conversations with the family.

We are very excited to hear about [REDACTED] acceptance to USC. The [REDACTED] are going to be great Trojans!

All best,

Sarah

**Sarah Peyron Murphy**  
Director of Development  
Marshall School of Business  
University of Southern California  
AT&T Center, 29th Floor  
Los Angeles, CA 90089  
Tel: 213-740-5260 | Cell: 804-627-1459  
Email: [sarah.murphy@marshall.usc.edu](mailto:sarah.murphy@marshall.usc.edu)

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**From:** Liz Frank <liz.frank@usc.edu>  
**Date:** Friday, February 21, 2014 3:04 PM  
**To:** "Orr, Ron" <rorr@usc.edu>, Sarah Peyron Murphy <peyronmu@marshall.usc.edu>  
**Cc:** Donna Heinel <dheinel@usc.edu>, Scott Jacobson <jacobson@usc.edu>  
**Subject:** Re: [REDACTED]

Hi Ron,

As of now, Sarah Murphy and I see [REDACTED] as a high level prospect with 1-5M potential. The two of us have a very warm relationship with [REDACTED] and have been working with the family since last March.

Our initial conversations began around [REDACTED] desire to host MBA students in New York. His interest in Marshall heightened with [REDACTED] application and since then he has become engaged in specific areas of the school including the Marshall Board and Career services Center (something he has done at [REDACTED])

While we plan to continue our conversations with [REDACTED] about a gift to Marshall, we would be happy to also explore the possibility of carving out a piece of that initial gift to support athletics as well. There is plenty of room with this family for everyone to "win" here, in my opinion.

You can see the contact reports Sarah and I have filed in [REDACTED]

Let me know what you think. I have ccd Sarah on here as well.

Liz

On Feb 21, 2014, at 4:59 PM, "Ron Orr" <[rorr@usc.edu](mailto:rorr@usc.edu)> wrote:

Please give me ideas on what kind of development opportunities we can explore with the family?

-----Original Message-----

From: Liz Frank [<mailto:liz.frank@usc.edu>]  
Sent: Friday, February 21, 2014 1:58 PM  
To: Ron Orr; 'Donna Heinel'  
Cc: Scott Jacobson  
Subject: Re: [REDACTED]

Thanks for all your help, Donna!

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Elizabeth Frank  
Assistant Director, New York City Office of University Advancement  
University of Southern California  
600 Madison Avenue, 21st Floor  
New York, NY 10022  
Office: 212-207-3403  
Fax: 212-207-3423  
Cell: 917-587-9877  
Email: <[liz.frank@usc.edu](mailto:liz.frank@usc.edu)> <[liz.frank@usc.edu](mailto:liz.frank@usc.edu)>  
[liz.frank@usc.edu](mailto:liz.frank@usc.edu) <[liz.frank@usc.edu](mailto:liz.frank@usc.edu)>

From: Ron Orr <[rorr@usc.edu](mailto:rorr@usc.edu)> <<mailto:rorr@usc.edu>>  
Date: Friday, February 21, 2014 4:56 PM  
To: 'Donna Heinel' <[dheinel@usc.edu](mailto:dheinel@usc.edu)> <<mailto:dheinel@usc.edu>>, Liz Frank  
<[liz.frank@usc.edu](mailto:liz.frank@usc.edu)> <<mailto:liz.frank@usc.edu>>  
Cc: Scott Jacobson <[jacobson@usc.edu](mailto:jacobson@usc.edu)> <<mailto:jacobson@usc.edu>>  
Subject: RE: [REDACTED]

Thank you

From: Donna Heinel [<mailto:dheinel@usc.edu>]  
Sent: Friday, February 21, 2014 1:08 PM  
To: [liz.frank@usc.edu](mailto:liz.frank@usc.edu) <<mailto:liz.frank@usc.edu>>  
Cc: [rorr@usc.edu](mailto:rorr@usc.edu) <<mailto:rorr@usc.edu>>; Scott Jacobson  
Subject: [REDACTED]

Liz,

Yes, we have been working with the family on the acceptance of the their son, [REDACTED] Jovan has agreed to extend a walk-on position to [REDACTED] for the Fall 2014 as he is a quality water polo player in a high need position. I was able to receive an approval for admissions this past Thursday through our admissions subcommittee. Jovan and I are still working out whether there will be an invitation to summer training camp. I spoke to Jovan yesterday about setting up a call to the parents to solidify everything next week. If you need any other information, please don't hesitate to email or call [REDACTED]

Donna C. Heinel Ed.D

Senior Associate Athletic Director, SWA

Associate Professor-Rossier School of Education University of Southern  
California